

## **EXHIBIT 1**

**Sullivan, Nicole**

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**From:** Sullivan, Nicole  
**Sent:** Tuesday, December 10, 2024 4:46 PM  
**To:** Scott Schirick  
**Cc:** Mendelsohn, Alan; Butler, Thomas  
**Subject:** Meet and Confer Today

Dear Scott,

Thank you for meeting and conferring with me on providing a copy of the materials produced by CHIPS in response to the Bourlakovas' subpoena. There were two issues you raised. First, whether the Kazakovs are entitled to receive all responsive materials and whether there needs to be a confidentiality or protective order in place before the Kazakovs are provided a copy. With respect to the second, I will discuss with my clients and be ready to discuss on our next meet and confer.

With respect to the first issue, as I told you, the Court's Order was based on the finding that the subpoenaed records relate to the Bourlakovas alleged damages in the UK sought against the Kazakovs and the allegations that the Kazakovs stole their assets. I know you said you would review the Order and in an effort to assist that, I point you to page 3 of the Order where the Court allowed the Kazakovs to intervene "[b]ecause the Bourlakovas intend to use the requested discovery in their U.K. Proceeding against the Kazakovs, the Kazakovs' motion to intervene is granted." This was also conceded by the Bourlakovas who did not oppose the motion to intervene on the grounds that the Kazakovs have standing to challenge the subpoena seeking discovery to be used against them. *See* Opp. p. 1, fn 2. In addition, I would also refer you to pages 5 and 6 of the Court's Order where it explains that it believes the subpoenaed records are relevant to the allegations that the Kazakovs stole the Bourlakovas' assets.

As there was no limitation on their intervention, the Bourlakovas have conceded they intend to use all the subpoenaed materials against the Kazakovs and the Kazakovs are parties to the proceeding, a full production should be made. In an effort to fully meet and confer on this issue and as I already agreed on the phone, I will review the list of records you received to determine if there is any basis on which to find that they are completely irrelevant to the Kazakovs. You had agreed to produce that list today or tomorrow and I will promptly review it.

In a further effort to move this meet and confer forward, I have not located any cases that allows a party to only produce to a party a partial response to a subpoena. If you have any authority to the contrary and you can send it to me to review asap, that would be helpful.

Regards,  
Nicole



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